Automated Commercial Environment—Requirements Recommendation

Date:	6/21/01 Draft
Number:	ENT-007
Requestor:	Trade Coalition ¹ , Entry Process Subcommittee ²
Customs Co-Chair:	Phyllis Rubenstein, Millie Gleason
Trade Co-Chair:	Art Litman
Requirement	
Amend the present statute to provide, as an alternative, for a period of not more than 21 months from the beginning of the fiscal year for the filing of the reconciliation entry where the reconciliation is based on the importer's fiscal year.	
Business Need	
With specific regard to reconciliation, experience with the prototype has revealed that the fifteen-month period provided for filing the entry may not be long enough when a fiscal year is covered by the Reconciliation. Some importers that use the fiscal year as the period to be reconciled find that it takes nine months from the end of fiscal year to accumulate the necessary data. From a system design standpoint, flexibility is necessary to allow for the Reconciliation to be filed at any point in time after filing of summary data (via entry summary or IASS) and the transmission of Notice of Intent to Reconcile (now accomplished through a system flag).	
Technical Need	
Benefits	
Sufficient time for importers to close their yearly books and records and to accumulate, analyze and consolidate data for Reconciliation.	
Risks	
More justification needs to be presented as to why this is necessary and that, based on Customs experience and the reconciliation prototype, many companies are simply taking the extra time and doing little, if any, additional entry review.	
Related Subcommittees	
Accounts	
Priority: Critical High Medium Low	

¹ Richard M. Belanger, ERP III Letter to Stuart Seidel, April 10, 2001. ² June 27-28, 2001 Entry Process Subcommittee Meeting Minutes, Recommendation 1.